

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. :

WILLIAM HAYES, :

Defendant. :

3:CR-18-14

INDICTMENT

THE GRAND JURY CHARGES:

Count 1

18 U.S.C. §2423(a)


(Transportation of a Minor to Engage in Sexual Activity)

On multiple occasions between on or about June 20, 2015 and on or about July 22, 2016, the exact dates being unknown to the grand jury, within the Middle District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 1, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 1 from Pennsylvania and took her to Florida, with the intent that Victim 1 engage in sexual activity for which a person can be charged with a

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criminal offense. (Sexual Battery, F.S. 794.011(2)(a)).

In violation of 18 U.S.C. §2423(a).

Count 2

18 U.S.C. §2423(a)

(Transportation of a Minor to Engage in Sexual Activity)

Between on or about June 20, 2015 and on or about July 17, 2015, the exact date being unknown to the grand jury, within the Middle District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 1, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 1 from Pennsylvania and took her to Florida, with the intent that Victim 1 engage in sexual activity for which a person can be charged with a criminal offense. (Lewd or Lascivious Conduct, F.S. 800.04)

In violation of 18 U.S.C. §2423(a).

Count 3

18 U.S.C. §2423(a)

(Transportation of a Minor to Engage in Sexual Activity)

Between on or about June 26, 2016 and on or about July 22, 2016, the exact date being unknown to the grand jury, within the Middle District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 1, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 1 from Pennsylvania and took her to Florida, with the intent that Victim 1 engage in sexual activity for which a person can be charged with a criminal offense. (Unlawful Sexual Activity, F.S. 794.05)

In violation of 18 U.S.C. §2423(a).

Count 4

18 U.S.C. §2423(a)

(Transportation of a Minor to Engage in Sexual Activity)

Between on or about June 14, 2013 and on or about June 24, 2013, the exact date being unknown to the grand jury, within the Middle

District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 1, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 1 from Pennsylvania and took her to Tennessee, with the intent that Victim 1 engage in sexual activity for which a person can be charged with a criminal offense. (Aggravated Statutory Rape T.C.A. 39-13-506)

In violation of 18 U.S.C. §2423(a).

Count 5

18 U.S.C. §2423(a)

(Transportation of a Minor to Engage in Sexual Activity)

Between on or about June 22, 2014 and on or about July 11, 2014, the exact date being unknown to the grand jury, within the Middle District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 1, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 1 from Pennsylvania and took her to Tennessee, with the intent that Victim 1

engage in sexual activity for which a person can be charged with a criminal offense. (Aggravated Statutory Rape T.C.A. 39-13-506)

In violation of 18 U.S.C. §2423(a).

THE GRAND JURY FURTHER CHARGES:

Count 6

18 U.S.C. §2423(a)

(Transportation of a Minor to Engage in Sexual Activity)

On multiple occasions between on or about June 20, 2015 and on or about July 22, 2016, the exact dates being unknown, within the Middle District of Pennsylvania and elsewhere, the defendant,

WILLIAM HAYES,

did knowingly transport, Victim 2, who had not attained the age of 18 years, in interstate commerce when he picked up Victim 2 from Pennsylvania and took her to Florida, with the intent that Victim 2 engage in sexual activity for which a person can be charged with a criminal offense. (Lewd or Lascivious Conduct, F.S. 800.04)

In violation of 18 U.S.C. §2423(a).

A TRUE BILL

FOREPERS. 

Date: 01/23/2018

DAVID J. FREED
United States Attorney

By: 

EVAN GOTLOB
Assistant United States Attorney